

Remarks

The present response is filed with a Request for Continued Examination (RCE), and is to the Office Action mailed in the above-referenced case on May 7, 2003, made final. Claims 19-20 are pending for examination. The Examiner has rejected claims 19-20 under 35 U.S.C. 103(a) as being unpatentable over Berry et al. (U.S. 5,537,630), hereinafter Berry, in view of "The C++ Programming Language" by Bjarne Stroustrup, hereinafter Stroustrup.

Applicant has carefully reviewed the newly presented prior art references, and the Examiner's rejections and statements in the instant Office Action. In response, applicant herein amends the base claim to more particularly point out the subject matter regarded as the invention, and to establish that the claims as amended distinguish over the prior art presented. Applicant points out and argues the key limitations of applicant's base claim as amended to clearly and unarguably establish that applicant's claims as amended distinguish over the prior art presented, either singly or in combination.

Applicant herein amends claim 19 to specifically recite an object-oriented programming tool enabled for constructing an Interactive Process Module (IPM) adapted for interaction with modules of an operating system (OS) for accessing and providing data in a multimedia call center (MMCC).

Applicant believes the reference of Berry is improperly relied upon by the Examiner for a primary reference, particularly in view of applicant's above amendments to the base claim, and the Examiner appears to have taken the combined teachings out of context for reading on applicant's claims. The Examiner has stated in the instant Office Action that Berry discloses applicant's invention substantially as claimed, including creating a program in an object-oriented environment using a graphical user interface for sequentially building a

process comprising multiple tasks performed in a requisite order dictated by the prerequisite relationship. The Examiner further stated that alternatively, Stroustrup suggests applicant's invention by disclosing various well-known aspects of the C++ programming language.

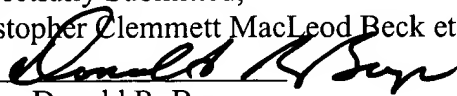
Berry, however, clearly fails to teach or suggest a programming tool enabled for creating an interactive process module as taught in applicant's invention and recited in applicant's claims as amended. Berry simply teaches a menu-driven approach for building a tree-diagram that specifies parameters for a method invocation. Berry discloses that the "method" is used to identify a function an object can perform such as setting its value, displaying itself, and so on. The "object" of Berry is a software component used by other applications for building a graphical user interface (GUI), the programming interface thereby enabling a programmer to visually assign attributes to an object by dragging and dropping said attributes from a "pallet" of the programming module to the object. Each object has certain data attributes and methods that operate on the data, the data being encapsulated by the object and modifiable by a programmer. Berry clearly teaches an entirely different invention for solving a different problem than as is taught in applicant's invention, and recited in applicant's claims as amended.

The object-oriented programming tool of applicant's invention enables the creation of interactive process modules, which are interactive with other modules and processes operating in the OS in a multimedia call center, for accessing and providing data. The interactive process modules can be called upon quickly within the multimedia call center to perform defined business processes according to needs in a timely and orderly fashion, automatically and directly conducting tasks by utilizing code sets executing within the interactive process module, and adapted for completion of specific tasks. Human intervention may therefore be excluded or greatly reduced in the overall process.

Applicant argues that the functionality and abilities of applicant's claimed object-oriented programming tool, are not taught or suggested in the prior art references provided by the Examiner, and neither reference reads on the limitations of applicant's base claim 19, as amended. Berry fails to teach an object-oriented programming tool enabled for creating a functional interactive process module adapted for interacting with other modules in a multimedia call center operating system, and further does not teach resulting output of the program. Stroustrup simply discloses that C++ programming may enable a user to create objects, which can be reused to create new programs, and that objects created may have dependencies upon each other, both concepts well known in the art.

Applicant believes that claim 19, therefore, is now clearly and unarguably patentable over Berry and Stroustrup, either singly or in combination. Claim 20, as depended from claim 19, is then patentable on its own merits or at least as depended from a patentable claim.

It is therefore respectfully requested that this application be reconsidered after Final, the claims be allowed, and that this case be passed quickly to issue. If there are any time extensions needed beyond any extension specifically requested with this amendment, such extension of time is hereby requested. If there are any fees due beyond any fees paid with this amendment, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully Submitted,
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by 

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